

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UTILITY WORKERS, LOCAL 369,  
Plaintiff,

v.

EXELON NEW ENGLAND POWER  
SERVICES, INC.,  
Defendant.

C.A. No. 04-CV-10293DPW

**JOINT MOTION TO EXTEND TIME TO FILE A RESPONSIVE PLEADING**

Defendant Exelon New England Power Services, Inc. ("Exelon") and Plaintiff Utility Workers, Local 369, hereby file this Joint Motion to Extend Time to File a Responsive Pleading, and jointly move the Court to extend the time in which Exelon must file a responsive pleading to Plaintiff's Complaint, up to and including March 26, 2004.

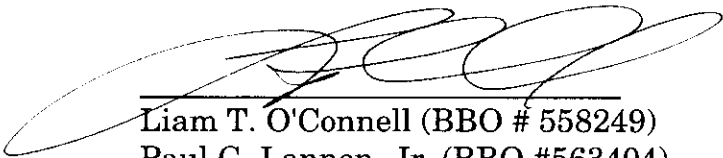
WHEREFORE, the parties respectfully request that the Court allow this  
assented-to Joint Motion.

Respectfully submitted,

EXELON NEW ENGLAND  
POWER SERVICES, INC.

By its Attorneys,

HOLLAND & KNIGHT LLP



Liam T. O'Connell (BBO # 558249)  
Paul G. Lannon, Jr. (BBO #563404)  
10 St. James Avenue  
Boston, MA 02116  
(617) 523-2700

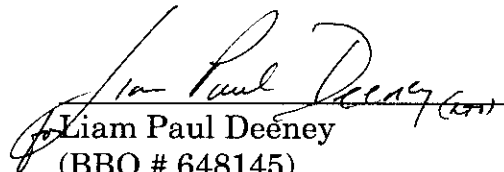
UTILITY WORKERS,  
LOCAL 369,

By its Attorneys,

SEGAL, ROITMAN &  
COLEMAN



Paul F. Kelly (BBO # 267000)  
11 Beacon Street  
Suite # 500  
Boston, MA 02108  
(617) 742-0208



Liam Paul Deeney  
(BBO # 648145)  
Utility Workers' Union of  
America  
Local 369  
120 Bay State Drive  
Braintree, MA 02184

Dated: March 5, 2004

I HEREBY CERTIFY THAT A TRUE COPY OF  
THE ABOVE DOCUMENT WAS SERVED  
UPON THE ATTORNEY OF RECORD FOR  
EACH OTHER PARTY BY MAIL/HAND ON:

5 March 2004

# HOLLAND & KNIGHT LLP

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St. Petersburg	*Holland & Knight LLC
San Antonio	**Representative Office

March 8, 2004

**LIAM T. O'CONNELL**  
617-305-2020  
ltoconnell@hklaw.com

## BY HAND

Clerk  
United States District Court  
1 Courthouse Way  
Suite 4110  
Boston, MA 02210

Re: Utility Workers, Local 369 v. Exelon New England Power Services, Inc.  
C.A. No. 04-CV-10293DPW

Dear Sir/Madam:

Enclosed for filing please find Joint Motion to Extend Time to File A Responsive Pleading. Please return the enclosed copy, stamped receipt, in the enclosed self-addressed, stamped envelope.

Thank you for you attention to this matter.

Sincerely yours,

HOLLAND & KNIGHT LLP



Liam T. O'Connell

LTO/afb

Enclosures

cc: Paul F. Kelly, Esquire  
Liam Paul Deeney, Esquire